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October 25, 2022

VIA ECF

Honorable Pamela K. Chen, United States District Judge United States District Court for the Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

> Re: United States v. McMahon, et al. Docket No. 21-cr-265

Dear Judge Chen,

As Your Honor is aware, this Firm represents Defendant Michael McMahon in the above-captioned matter. I write, with the consent of the Government, to respectfully request a two-week extension of time of the deadline for Mr. McMahon to file his reply brief in further support of his motion seeking a hearing with regard to the issues of Government misconduct alleged in our motion. Our reply is currently due this Thursday, October 27, 2022; as a result of a number of other deadlines in other cases, we are requesting an extension until Thursday, November 10, 2022. Again, the Government has very graciously consented to this request, which we genuinely appreciate.

If this schedule meets with Your Honor's approval, we would request that the Court So Order the relief sought in the space provided and file it on the Docket at Your Honor's convenience. Of course, if the Court has any questions or concerns, please do not hesitate to contact me. Thank you very much for your very kind consideration of this matter.

Respectfully submitted,

s/ Genna A. Conti
Genna A. Conti
Genna A. Conti

This ___ day of October, 2022

Honorable Pamela K. Chen
United States District Judge

cc: All counsel of record (via ECF)